

**IN THE UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF TENNESSEE**  
**AT KNOXVILLE**

<b>LEATHA WILLIAMS, as guardian of</b>	)	
<b>a minor, LAUREN WILLIAMS and</b>	)	
<b>ALICIA WILLIAMS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>No. 3:05-cv-141</b>
<b>v.</b>	)	
	)	
<b>CAMPBELL COUNTY, TENNESSEE,</b>	)	
<b>ET AL.</b>	)	
	)	
<b>Defendants.</b>	)	

**AFFIDAVIT OF SAMUEL FRANKLIN**

Samuel Franklin, after being duly sworn according to law, deposes and says as follows:

1. My name is Samuel Franklin. I am currently incarcerated at the Federal Correctional Institution in Manchester, Kentucky. At all material times, I was employed by the Campbell County Sheriff's Department.
2. I participated in a drug "round-up" investigation of approximately 70-80 persons, including the decedent, Ted Williams, who were indicted by the grand jury.
3. The only involvement that I may have had with Williams' that I can recall was role in his indictment <sup>SF SF</sup> and arrest.
4. I can state with certainty that I did not have any contact with Williams after his arrest, which was 40 plus hours before he committed suicide. Williams suicide was a surprise to me.

5. If and to the extent plaintiffs contend that I conspired with others to intentionally kill Ted Williams, I did no such things, and have no information that Williams' death resulted from any cause other than his voluntary choice to hang himself.

Further, affiant saith not.

Samuel Franklin  
Samuel Franklin

STATE OF KENTUCKY )  
COUNTY OF Clay )

Personally appeared before me Samuel Franklin, with whom I am personally acquainted, and who acknowledged that she executed the within instrument for the purposes therein contained.

Witnessed my hand, at office, this the 3<sup>rd</sup> day of August, 2006.

Roi Salisbury  
Notary Public

My Commission Expires: April 3, 2010